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Via Federal Express

Document Processing Center (Mail Code 7407M)
Room 6428
Attention: 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency, ICC Building
1201 Constitution Ave., NW
Washington, DC 20460

Dear 8(e) Coordinator:

Epoxy Functional Acrylic Polymer

This letter is to inform you of the results of two *in vitro* genotoxicity tests, with the above referenced test material. Dimethyl sulfoxide (DMSO) was selected as the test substance solvent for both test systems.

The test material was evaluated in the *in vitro* Bacterial Reverse Mutation Test with an independent repeat assay using *Salmonella typhimurium* tester strains TA98, TA100, TA1535, and TA1537 and *Escherichia coli* tester strain WP2uvrA in the presence and absence of Aroclor induced rat liver S9. Dose levels tested in the initial assay were 50, 150, 500, 1500, and 5000 µg/plate. A 2.7-fold increase was observed with tester strain TA1535 in the presence of S9 at the 1500 µg/plate dose level. In the independent repeat assay, the dose levels tested were 150, 500, 1500, 2500, and 5000 µg/plate. Positive responses were observed with tester strain TA1535 in the presence of S9 at the 2500 µg/plate dose level (3.6-fold increase) and at 5000 µg/plate (4.4-fold increase). No appreciable toxicity was observed.

The test material was also evaluated in the *in vitro* mammalian chromosome aberration test using human peripheral blood lymphocytes (HPBL), in both the presence and absence of Aroclor-induced rat liver S9. A total of three trials were conducted. These included a 4-hour and a 20-hour treatment without S9 metabolic activation (50, 100, and 200 µg/ml), and a 4-hour treatment with S9 metabolic activation (25, 50, and 150 µg/ml). The test substance resulted in a statistically significant increase in clastogenic activity ($p \leq 0.01$, Fisher's Exact Test) at the top dose level of 200 µg/ml only, in the absence of S9 metabolic activation after a 20-hour treatment.

Under these experimental conditions, the findings described above appear to be reportable, based upon the guidance given in the EPA TSCA Section 8(e) Reporting Guide (1991).

COMPANY SANITIZED

Sincerely,

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